

# **EXHIBIT C**

J. RANDALL ANDRADA (SBN 70000)  
randrada@andradalaw.com  
 VALERIE LY (SBN 270425)  
vly@andradalaw.com

**ANDRADA & ASSOCIATES  
 PROFESSIONAL CORPORATION**

180 Grand Avenue, Suite 225  
 Oakland, California 94612  
 Tel.: (510) 287-4160  
 Fax: (510) 287-4161

Attorneys for Defendants  
 COUNTY OF ALAMEDA,  
 GREGORY J. AHERN in his capacity as  
 Sheriff for County of Alameda, and Deputies  
 MATTHEW AHLF, ALEJANDRO VALVERDE,  
 JOSHUA SWETNAM, ROBERTO MARTINEZ,  
 ZACHARY LITVINCHUK, RYAN MADIGAN,  
 MICHAEL BARENO, FERNANDO ROJAS-  
 CASTANEDA, SHAWN SOBRERO, and  
 SOLOMON UNUBUN, all individually and in  
 their official capacities as Deputy Sheriffs for  
 County of Alameda

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND DIVISION

M.H., a minor, individually through his Guardian  
 Ad Litem, Michelle Henshaw, JOSEPH  
 HARRISON, KRYSTLE HARRISON, MARTIN  
 HARRISON JR., and TIFFANY HARRISON, all  
 Individually and as Co-Successors in Interest for  
 Decedent MARTIN HARRISON,

Plaintiffs,

v.

COUNTY OF ALAMEDA, a municipal  
 corporation; GREGORY J. AHERN, in his  
 capacity as Sheriff for the COUNTY OF  
 ALAMEDA; DEPUTIES MATTHEW AHLF,  
 ALEJANDRO VALVERDE, JOSHUA  
 SWETNAM, ROBERTO MARTINEZ,  
 ZACHARY LITVINCHUK, RYAN MADIGAN,  
 MICHAEL BARENO, FERNANDO ROJAS-  
 CASTANEDA, SHAWN SOBRERO,  
 SOLOMON UNUBUN, and DOES 1-20,  
 individually, jointly and severally,

Defendants.

Case No.: 4:11-cv-02868-CW

**RESPONSE TO PLAINTIFFS' NOTICE  
 OF INSPECTION**

Action Filed: June 10, 2011

1 PROPOUNDING PARTY: Plaintiffs JOSEPH HARRISON, KRYSTLE HARRISON, MARTIN  
2 HARRISON, JR., and TIFFANY HARRISON

3 RESPONDING PARTY: ALL DEFENDANTS

4 SET NUMBER: ONE

5 Pursuant to Federal Rule of Civil Procedure 34, defendants COUNTY OF ALAMEDA,  
6 GREGORY J. AHERN, MATTHEW AHLF, ALEJANDRO VALVERDE, JOSHUA SWETNAM,  
7 ROBERTO MARTINEZ, ZACHARY LITVINCHUK, RYAN MADIGAN, MICHAEL BARENO,  
8 FERNANDO ROJAS-CASTANEDA, SHAWN SOBRERO, and SOLOMON UNUBUN respond to  
9 plaintiffs' Request for Production of Documents, Set No. Three, as follows:

10 **GENERAL OBJECTIONS**

11 Responding Parties expressly reserve all objections regarding the competency, relevance,  
12 materiality, probative value and admissibility of all information provided. Responding Parties also  
13 expressly reserve all objections as to vagueness, ambiguity, unintelligibility and overbreadth.

14 Responding Parties provide the responses herein without prejudice to further discovery.  
15 Responding Parties have not completed their investigation, discovery or preparation for trial in this  
16 matter, and the responses set forth below are based solely upon information available to Responding  
17 Parties at the time of the preparation of these responses. Discovery will continue as long as permitted  
18 by statute or stipulation of the parties, and investigation by the attorneys and/or agents of Responding  
19 Parties will continue throughout the trial of this action. Responding Parties therefore specifically  
20 reserve the right at the time of trial to introduce any evidence from any source which may hereinafter be  
21 discovered.

22 These responses are accurate as of the date of these responses. However, Responding Parties  
23 are continuing to investigate this matter and, therefore, cannot exclude the possibility of obtaining  
24 more complete information or information indicating the responses supplied herein are incorrect.

25 If any information has unintentionally been omitted from these responses, Responding Parties  
26 reserve the right to supplement their responses per Federal Rule of Civil Procedure 26(e)(2).

27 Responding Parties object to plaintiffs' requests for production of documents on the ground  
28 and to the extent they seek information subject to the attorney-client privilege, the work product



1 doctrine and/or any other lawful privilege.

2 These introductory comments shall apply to each and every response provided herein, and  
3 shall be incorporated by reference as though fully set forth in all of the responses provided herein.

4 **RESPONSES TO REQUESTS**

5 **REQUEST NO. 1:**

6 Produce all original documents reflecting medical, mental health, or other records of Martin  
7 Harrison, including but not limited to ACSO 130 to 141, as well as all records from Glenn Dyer Jail, for  
8 forensic inspection, copying, testing and/or sampling, pursuant to FRCivP 34.

9 **RESPONSE TO REQUEST NO. 1:**

10 Responding Parties object to this request on the grounds and to the extent that it seeks  
11 information that is not relevant, not likely to lead to the discovery of admissible evidence, and beyond  
12 the scope of permissible discovery. Subject to and without waiving said objections, Responding Parties  
13 state as follows:

14 Responding Parties will make available the above mentioned documents that are in their  
15 possession, custody, or control at a mutually agreeable time and date.

16 **REQUEST NO. 2:**

17 Permit entry of Plaintiffs' counsel and/or their representatives onto the premises of the Alameda  
18 County Sheriff's Department Santa Rita Jail, so that they may inspect, measure, survey, and photograph  
19 the property, including but not limited to each cell in which Martin Harrison was housed, all deputies'  
20 areas, the nursing areas, and the criminal justice mental health areas.

21 **RESPONSE TO REQUEST NO. 2:**

22 Responding Parties object to this request on the grounds and to the extent that it seeks  
23 information that is not relevant, not likely to lead to the discovery of admissible evidence, and beyond  
24 the scope of permissible discovery. Subject to and without waiving said objections, Responding Parties  
25 state as follows:


26 Responding Parties will make available the premises of Santa Rita Jail for inspection at a  
27 mutually agreeable time and date subject to the institution's security restrictions.

28 ///

1 Dated: September 21, 2012.

ANDRADA & ASSOCIATES

2  
3 By

  
J. RANDALL ANDRADA  
VALERIE LY  
Attorneys for Defendants  
COUNTY OF ALAMEDA,  
GREGORY J. AHERN, MATTHEW  
ALHF, ALEJANDRO VALVERDE,  
JOSHUA SWETNAM, ROBERTO  
MARTINEZ, ZACHARY LITVINCHUK,  
RYAN MADIGAN, MICHAEL BARENO,  
FERNANDO ROJAS-CASTANEDA,  
SHAWN SOBRERO, and SOLOMON  
UNUBUN

4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
ANDRADA & ASSOCIATES  
PROFESSIONAL CORPORATION

**PROOF OF SERVICE***M.H. v. County of Alameda, et al.*

U.S.D.C. Northern District (San Francisco) Case No. 4:10-cv-02868-CW

I, the undersigned, declare that I am over the age of 18 years and not a party to the within action; that my business address is 180 Grand Avenue, Suite 225, Oakland, California; and that on September 24, 2012, I served a true copy of the foregoing document(s) entitled:

**RESPONSE TO PLAINTIFFS' NOTICE OF INSPECTION**

on the parties in this action by placing a true copy thereof in a sealed envelope addressed as follows:

John L. Burris, Esq.

Attorneys for Plaintiffs

Benjamin Nisenbaum, Esq.

Law Offices of John L. Burris

Airport Corporate Centre

7677 Oakport Street, Suite 1120

Oakland, CA 94621

Tel: 510-839-5200 / Fax: 510-839-3882

[john.burris@johnburrislaw.com](mailto:john.burris@johnburrislaw.com)[bnisenbaum@gmail.com](mailto:bnisenbaum@gmail.com)

Michael J. Haddad, Esq.

Attorneys for Plaintiffs

Julie Sherwin, Esq.

Gina Altomare, Esq.

Haddad &amp; Sherwin

505 Seventeenth Street

Oakland, CA 94612

Tel: 510-452-5500 / Fax: 510-452-5510

[haddad.sherwin@sbcglobal.net](mailto:haddad.sherwin@sbcglobal.net)[gina.altomare@sbcglobal.net](mailto:gina.altomare@sbcglobal.net)

  X   (By E-Mail & U.S. Mail) I caused each document to be sent via e-mail to the addresses listed above; I caused each envelope with postage fully prepaid to be placed for collection and mailing following the ordinary business practices of Andrada & Associates.

       (By Hand) I caused each envelope to be delivered by hand to the person(s) listed above.

       (By Telecopy) I caused each document to be sent by fax to the fax as indicated above.

       (By Overnight Delivery) I caused each envelope to be delivered by overnight delivery to the person(s) indicated above.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on September 24, 2012, at Oakland, California.

  
 GEORGIA LEE